

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

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United States of America, :
: Plaintiff,
: :
-against- : Criminal No. 1:19-cr-10080-NMG
David Sido, et al., :
: Defendants.
:
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**NONPARTY UNIVERSITY OF SOUTHERN CALIFORNIA'S
MOTION FOR LEAVE TO FILE MOTION TO QUASH AND MEMORANDUM IN
SUPPORT UNDER SEAL**

Nonparty University of Southern California ("USC"), by and through undersigned counsel, hereby respectfully moves this Honorable Court for leave to file under seal its Motion to Quash and Memorandum in Support of its Motion to Quash Defendants' Rule 17(c) subpoena ("the Motion"). In support of this motion, USC states that it seeks to file its Motion under seal in an abundance of caution because it understands that the subpoena itself was authorized by the Court pursuant to an *ex parte* sealed filing by the Defendants. In order to address the subpoena's specific demands that USC would like quashed in a manner consistent with this Court's prior order sealing the subpoena, USC seeks permission to file its Motion under seal.

WHEREFORE, USC respectfully requests that this Court allow it leave to file its Motion under seal.

COMPLIANCE WITH LOCAL RULE 7.1(a)(2)

Undersigned counsel attempted to but was unable to confer with Defense counsel to obtain Defendants' position on sealing the Motion to Quash and Memorandum in Support.

Respectfully submitted,

UNIVERSITY OF SOUTHERN CALIFORNIA,
By its attorneys,

/s/ Douglas Fuchs

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April 16, 2020

CERTIFICATE OF SERVICE

I, hereby certify that this document filed through ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent those indicated as nonregistered participants on April 16, 2020.

/s/ Anthony E. Fuller

Anthony E. Fuller